

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
KATHLEEN E. CASSIDY  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
KAREN R. KING  
THOMAS A. MCKAY  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

[www.maglaw.com](http://www.maglaw.com)

WRITER'S CONTACT INFORMATION

[ranello@maglaw.com](mailto:ranello@maglaw.com)  
(212) 880-9520

March 4, 2024

SENIOR COUNSEL  
PAUL R. GRAND

COUNSEL  
JASMINE JUTEAU

ROBERT G. MORVILLO  
1938-2011

MICHAEL C. SILBERBERG  
1940-2002

JOHN J. TIGUE, JR.  
1939-2009

\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*ALSO ADMITTED IN CONNECTICUT

**VIA ECF**

The Honorable Leda Dunn Wettre  
United States District Court  
Martin Luther King Jr. Federal Building & U.S. Courthouse  
50 Walnut Street, Room 3C  
Newark, NJ 07102

Re: *United States v. Silviu Catalin Balaci*, Case No. 19-cr-877-CCC

Dear Judge Wettre:

Please accept this letter in lieu of a more formal motion on behalf of defendant Silviu Balaci. Mr. Balaci's current bail conditions, imposed on July 21, 2020, following his guilty plea on July 9, 2020, require, among other things, that he reside in and remain in Germany. Mr. Balaci has fully complied with his bail conditions to date.

We respectfully request, with no objection from the government or Pretrial Services, to modify Mr. Balaci's bail conditions to allow him to travel throughout the European Union. Mr. Balaci will continue to reside in Germany. Before any travel to another EU country, Mr. Balaci will provide advance notice via email to Pretrial Services, detailing his itinerary (including the dates of the planned travel), the purpose of the travel, and any other applicable details.

As noted, neither the government nor Pretrial Services objects to this request. Thank you for the Court's attention to this matter.

Respectfully submitted,  
/s/ Robert J. Anello  
Robert J. Anello

cc: Assistant United States Attorney Anthony Torntore (via ECF and email)  
U.S. Pretrial Services Officer Rhonda LeGrand (via email)